

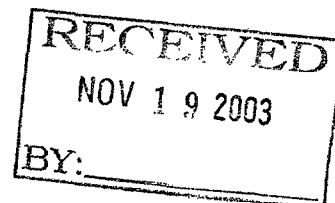


TUNG HAI™ Chlorella

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November 7, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St., S.W.
Washington, DC 20204



RE: Dietary Supplement Statement of Support Notification

To: Whom It May Concern:

Nutritional Specialties, Inc., 1456 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "Based on clinical studies, aids in reducing calories by inhibiting carbohydrate digestion and absorption from starchy foods."

This claim is being made for Phase 2 Starch Neutralizer™ (phaseolus Vulgaris). Which is contained in LifeTime® Trim Down™ Phase 2™ Carb Control Tablets. This submission is being made in compliance with the requirements of 21 CFR 101.93.

The undersigned is an authorized representative of Nutritional Specialties, Inc. and certifies that the information contained in this notice is complete and accurate, and that Nutritional Specialties, Inc. has substantiation that the above statement is truthful and not misleading.

Harry G. Shippy
Signature
HARRY AUGUST SHIPPY
Full Name
PRESIDENT
Title

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NUTRITIONAL SPECIALTIES, INC.
1456 E. Katella Avenue • Anaheim, CA 92805
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Email: lifetimevitamins@sbcglobal.net

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Life TIME

TRIM DOWN™

Phase 2™

**STARCH NEUTRALIZER
CARB CONTROL
750 Mg.**

Dietary Supplement

60 Tablets

Supplement Facts

Serving Size: 1 Tablet
Servings Per Container: 60

Amount Per Serving	%Daily Value
Phase 2 Starch Neutralizer™ (Phaseolus Vulgaris)	750 mg.

*Daily Value not established.

Other Ingredients: Dicalcium Phosphate, Stearic Acid, Croscarmellose, Magnesium Stearate, Silicon Dioxide, Methylcellulose, Water.

SUGGESTED USE: Take one (1) tablet directly before high carbohydrate meals up to three (3) times daily or as directed by your health care professional.

If pregnant or lactating, consult your health care professional before using this natural supplement.

Contains no yeast, corn, gluten, dairy products, salt, sugar, starch, artificial coloring, artificial flavoring or preservatives. Not a low caloric food.

Based on clinical studies, aids in reducing calories by inhibiting carbohydrate digestion and absorption from starchy foods.

This statement has not been evaluated by the Food & Drug Administration (FDA).
This product is not intended to diagnose, cure or prevent any disease.

LifeTime® products are manufactured to meet strict quality control standards and formulated using only quality industry acceptable materials. An environmentally concerned company.

Formulated and Distributed by:
LifeTime®, Nutritional Specialties, Inc.
Anaheim, CA 92805
www.lifetimevitamins.com